

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Todd A. Brunner and
Sharon Y. Brunner,

Case No. 11-29064
Chapter 11

Debtors.

OBJECTION TO CORNERSTONE COMMUNITY BANK'S MOTION FOR RELIEF FROM
AUTOMATIC STAY

Debtors hereby object to the Motion of Cornerstone Community Bank for Relief from Automatic Stay regarding the Debtors' real property located at 2915 S. Stigler Road, New Berlin, Wisconsin. This objection does not pertain to the Debtors' properties at 408 Terry Lane, Watertown, Wisconsin nor N3018 Koch Road, Hebron, Wisconsin. The grounds for the objection are as follows:

1. The septic system at the Stigler Road property has failed and that is the reason for the Debtors' reduced value for this property. If the septic system is replaced with either a mound system or a holding tank, at an estimated cost of approximately \$20,000.00, the Stigler Road property will have a value in excess of \$150,000.00, meaning there is substantial equity in said property. The Stigler Road property is a good property located in a good area of New Berlin.
2. Cornerstone Community Bank has a second mortgage on the Stigler Road property in the amount of \$50,000.00 which has not been addressed in its motion. This \$50,000.00 second mortgage was to collateralize an additional \$50,000.00 increase in Cornerstone

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Community Bank's line of credit collateralized by the Terry Lane and Koch Road property. There is also a \$50,000.00 second mortgage on four other properties upon which Cornerstone Community Bank has first mortgages on. The issue of these second mortgages must be resolved before the Stigler property can be foreclosed upon.

Dated this 19th day of September, 2011.

LAW OFFICES OF JONATHAN V. GOODMAN
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/s/ Jonathan V. Goodman

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